

Statement of Basis

Loparex LLC
Cullman County
Facility No. 702-0023

This is a proposed renewal of an existing Title V Major Source Operating Permit. The current permit expires on January 26, 2010.

Loparex operates a paper coating facility in the city of Cullman, Cullman County, Alabama. The coated paper rolls are used as a release backing on a variety of products such as address labels.

Loparex is a major Title V facility with significant emissions of volatile organic compounds (VOC), and hazardous air pollutants (HAPS). Air emissions from this facility in 2008 were 716 tons of VOCs and 37 tons of toluene. Loparex is not a potential major source of any criteria pollutants.

The due date for the quarterly reports was changed from the 10th to the 15th to allow Loparex more time to prepare this report.

The following is a summary of the sources, regulations, and periodic monitoring.

Coater 3

The VOC emissions from this coater are limited to 39 tons in any twelve month period to avoid PSD. Coater 3 is subject to the Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR Part 60, Subpart RR, because it was installed after December 30, 1980. However, Coater 3 is not subject to the VOC limits of 40 CFR 60.442(a) because VOC emissions are less than 50 tons per year. This unit is subject to the National Emissions Standards for Hazardous Air Pollutants: Paper and Other Web Coating, 40 CFR Part 63, Subpart JJJJ, because this facility is a major source of HAPs. The facility has elected to show compliance with JJJJ by limiting HAP content to less than 4%.

Pollutants	Limitation	Regulations	Monitoring
VOCs	39 TPY	PSD	recordkeeping
HAPs	4% HAP	40 CFR 63.3370(a)(2)	recordkeeping

Coater 5

Coater 5 is not subject to 40 CFR Part 60, Subpart RR, because it was installed in 1969. Records of VOC emissions are required for Title V fees. This unit is subject to the National Emissions Standards for Hazardous Air Pollutants: Paper and Other Web Coating, 40 CFR Part 63, Subpart JJJJ, because this facility is a major source of HAPs. The facility has elected to show compliance with JJJJ by limiting HAP content to less than 4%.

Pollutants	Limitation	Regulations	Monitoring
VOCs	none	ADEM Admin. Code R. 335-1-7-.04	recordkeeping
HAPs	4% HAP	40 CFR 63.3370(a)(2)	recordkeeping

Coater 12

Coater 12 is not subject to 40 CFR Part 60, Subpart RR, because it was installed in 1966. Records of VOC emissions are required for Title V fees. This unit is subject to the National Emissions Standards for Hazardous Air Pollutants: Paper and Other Web Coating, 40 CFR Part 63, Subpart JJJJ, because this facility is a major source of HAPs. The facility has elected to show compliance with JJJJ by limiting HAP content to less than 4%.

Pollutants	Limitation	Regulations	Monitoring
VOCs	none	ADEM Admin. Code R. 335-1-7-.04	recordkeeping
HAPs	4% HAP	40 CFR 63.3370(a)(2)	recordkeeping

Coater 11

The VOC emissions from this coater are limited to 39 tons in any twelve month period to avoid PSD. Coater 11 is subject to the Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR Part 60, Subpart RR, because it was installed after December 30, 1980. However, Coater 11 is not subject to the VOC limits of 40 CFR 60.442(a) because VOC emissions are less than 50 tons per year. This unit is subject to the National Emissions Standards for Hazardous Air Pollutants: Paper and Other Web Coating, 40 CFR Part 63, Subpart JJJJ, because it is a major source of HAPs.

Pollutants	Limitation	Regulations	Monitoring
VOCs	39 TPY	PSD	recordkeeping
HAPs	4% HAP	40 CFR 63.3370(a)(2)	recordkeeping

Hal Brock
Industrial Chemicals Section
Air Division

January 12, 2010
Date